PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Structural Composites of Indiana, Inc.
1118 Gerber Street
Ligonier, Indiana 46767

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 113-12934-00074	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 20, 2002 Expiration Date: March 20, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary customized fiberglass parts manufacturing plant.

Responsible Official:	James Fearnow, Production Manager
Source Address:	1118 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	1118 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	219 - 894 - 4312
SIC Code:	3089
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) gel and lamination area consisting of a gel coating process with air-assisted airless spray guns, dry filters for air pollution control and an approximate capacity of 184 pounds of resin per hour, a lamination process with flow coater equipment, dry filters for air pollution control, and an approximate capacity of 720 pounds of resin per hour and three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute.

(b) One (1) mold preparation and final finish area, equipped with spray guns, and dry filters for air pollution control.

(c) One (1) grinding booth, equipped with grinders, diamond cutters and various hand tools, with dry filters for air pollution control, exhausting to Stack GRD 08-11, capacity: 920 pounds per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive

blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(c) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO_2, and/or NO_X, three (3) pounds per hours or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:

A wood shop for mold making with saws, drills, sanders, etc., eight (8) diamond cutters, five (5) hand grinders, eight (8) die grinders, twelve (12) DA hand sanders, two (2) jig saws, seven (7) hand drills, twelve (12) hand buffers, three (3) table saws, three (3) circular saws, two (2) sawsails, two (2) band saws, two (2) bench grinders, two (2) arc welders, one (1) oxyacetylene torch. [326 IAC 6-3-2]

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Norther Regional Office Telephone: 219-245-4870
Norther Regional Office Facsimile: 219-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30)

days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this

permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M,

is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such addi-

tional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Devia-

tion and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) gel and lamination area consisting of a gel coating process with air-assisted airless spray guns, dry filters for air pollution control and an approximate capacity of 184 pounds of resin per hour, a lamination process with flow coater equipment, dry filters for air pollution control, and an approximate capacity of 720 pounds of resin per hour and three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute.

(b) One (1) mold preparation and final finish area, equipped with spray guns, and dry filters for air pollution control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Toxics Control [326 IAC 2-4.1-1] [326 IAC 8-1-6]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the customized fiberglass part manufacturing source shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAPs from use of such resins and gel coats only shall be less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites,” Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) -(Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) * EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use

of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

Compliance with this condition shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

D.1.2 Emissions from Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

(a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.

(B) All production and tooling gel coats that contain HAPs.

(C) Waste resins and gel coats that contain HAPs.

(D) Cleaning materials, including waste cleaning materials.

(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the gelcoat booth, the lamination booth, and the mold preparation and finish area shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for the gelcoat booth, the lamination booth, the mold preparation and finish area, and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic HAPs

Compliance with the volatile organic HAP content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Volatile Organic HAPs Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic HAP usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the gelcoat booth, lamination booth and mold preparation and finish area are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the gelcoat booth, lamination booth and mold preparation and finish area stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the volatile organic HAP usage limits and/or the volatile organic HAP content limits established in Conditions D.1.1 and D.1.2.

(1) The amount, VOC content and volatile organic HAP content of each resin and gelcoat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) Method of application and other emission reduction techniques for each resin and gel coat used;

(4) The HAP monomer content for resins and gelcoats calculated on an equivalent mass basis for each month in which noncompliant resins or gelcoats are used;

(5) The cleanup solvent usage for each month;

(6) The calculated total VOC and volatile organic HAP usage for each month; and

(7) The weight of VOCs and volatile organic HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.2(b), the Permittee shall maintain the following training records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the

commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.

(2) Address of the physical location.

(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(d) One (1) grinding booth, equipped with grinders, diamond cutters and various hand tools, with dry filters for air pollution control, exhausting to Stack GRD 08-11, capacity: 920 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the one (1) grinding booth shall not exceed 2.44 pounds per hour when operating at a process weight rate of 920 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

In order to comply with Condition D.2.1, the dry filters for PM control shall be in operation and control emissions from the one (1) grinding booth at all times that the one (1) grinding booth is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no specific Compliance Monitoring Requirements applicable to this emission unit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(c) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO_2, and/or NO_X, three (3) pounds per hours or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:

A wood shop for mold making with saws, drills, sanders, etc., eight (8) diamond cutters, five (5) hand grinders, eight (8) die grinders, twelve (12) DA hand sanders, two (2) jig saws, seven (7) hand drills, twelve (12) hand buffers, three (3) table saws, three (3) circular saws, two (2) sawsails, two (2) band saws, two (2) bench grinders, two (2) arc welders, one (1) oxyacetylene torch. [326 IAC 6-3-2]

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the grinding and machining operations, the wood shop, and the trimmers shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 1118 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T 113-12934-00074

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 1118 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T 113-12934-00074

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 1118 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T 113-12934-00074
Facilities: The gelcoat booth, the lamination booth, and the mold preparation and final finish area
Parameter: Volatile Organic HAP emissions
Limit: Less than one hundred (100) tons per twelve (12) consecutive month period

YEAR: _____

Month	Volatile Organic HAP emissions (tons)	Volatile Organic HAP emissions (tons)	Volatile Organic HAP emissions (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Structural Composites of Indiana, Inc.
Source Address: 1118 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 1118 Gerber Street, Ligonier, Indiana 46767
Part 70 Permit No.: T 113-12934-00074

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: ______________________

Submitted by: ____

Title/Position: ____

Signature: ____

Date: ____

Phone: ____

Attach a signed certification to complete this report.

March 20, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: **Structural Composites of Indiana, Inc.**
Source Location: **1118 Gerber Street, Ligonier, Indiana 46767**
County: **Noble**
SIC Code: **3089**
Operation Permit No.: **T 113-12934-00074**
Permit Reviewer: **Edward A. Longenberger**

On November 20, 2001, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Structural Composites of Indiana, Inc. had applied for a Part 70 Operating Permit to operate a customized fiberglass parts manufacturing plant with dry filters as control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. Condition B.2 has had the rule cite 326 IAC 2-1.1-9.5 added to include the new promulgated rule which clarifies when permits expire and when conditions in previous issued permits are superseded as follows:

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. Condition B.12 (Emergency Provisions), paragraphs (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16, which removed the affirmative defense for health-based emergencies because Part 70 only allows this defense for technology-based emergencies:

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the

emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. Condition B.14 (Multiple Exceedances) has been deleted because 326 IAC 2-7-5(1)(E) has been repealed:

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. A new Condition B.14 (Prior Permit Conditions Superceded) has been added to the proposed permit in order to clarify the intent of the new rule, 326 IAC 2-1.1-9.5, regarding when prior permit conditions are superseded. In addition, Condition B.13(b) has been deleted since paragraph (b) is no longer necessary due to the addition of the new Condition B.14:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

5. The IDEM, OAQ, has revised Condition B.15 (Deviations from Permit Requirements and Conditions) to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. Condition B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule~~. ~~It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

6. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised Condition C.8 (Asbestos Abatement Projects) to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has also revised Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test); a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do**es** ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

7. The IDEM, OAQ has restructured Condition C.16 to clarify the contents and implementation of the compliance response plan. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. Additionally, in subsection (c)(2), "administrative amendment" has been changed to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed:

C.16 Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5)~~ ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee**, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected time frame for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following

reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

In light of this, all references in the permit to "Compliance Monitoring Plan" have been changed to "Compliance Response Plan."

March 20, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Structural Composites of Indiana, Inc.**
Source Location:	**1118 Gerber Street, Ligonier, Indiana 46767**
County:	**Noble**
SIC Code:	**3089**
Operation Permit No.:	**T 113-12934-00074**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Structural Composites of Indiana, Inc. relating to the operation of a customized fiberglass parts manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) gel and lamination area consisting of a gel coating process with air-assisted airless spray guns, dry filters for air pollution control and an approximate capacity of 184 pounds of resin per hour, a lamination process with flow coater equipment, dry filters for air pollution control, and an approximate capacity of 720 pounds of resin per hour and three (3) exhaust fans with a flow rate of 10,000 cubic feet per minute.

(b) One (1) mold preparation and final finish area, equipped with spray guns, and dry filters for air pollution control.

(c) One (1) grinding booth, equipped with grinders, diamond cutters and various hand tools, with dry filters for air pollution control, exhausting to Stack GRD 08-11, capacity: 920 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

(c) Other activities or categories not previously identified with emissions equal to or less than the insignificant thresholds of five (5) pounds per hour or twenty-five (25) pounds per day for PM, SO_2, and/or NO_X, three (3) pounds per hours or fifteen (15) pounds per day for VOC, twenty-five (25) pounds per day for CO or 0.6 tons per year or 3.29 pounds per day of lead:

A wood shop for mold making with saws, drills, sanders, etc., eight (8) diamond cutters, five (5) hand grinders, eight (8) die grinders, twelve (12) DA hand sanders, two (2) jig saws, seven (7) hand drills, twelve (12) hand buffers, three (3) table saws, three (3) circular saws, two (2) sawsails, two (2) band saws, two (2) bench grinders, two (2) arc welders, one (1) oxyacetylene torch. [326 IAC 6-3-2]

(d) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]

(e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Five (5) natural gas-fired radiant heaters, rated at 0.03 million British thermal units per hour, each.

(2) One (1) natural gas-fired air make-up system, rated at 3.575 million British thermal units per hour.

(3) Three (3) natural gas-fired radiant heaters, rated at 0.15 million British thermal units per hour.

(4) One (1) natural gas-fired oven, rated at 0.225 million British thermal units per hour.

(g) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(h) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(i) Infrared cure equipment.

(j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38EC).

(n) Other activities or categories not previously identified with emissions equal to or less than the insignificant threshold of three (3) pounds per hour or fifteen (15) pounds per day for VOC: One (1) bulk resin storage tank, capacity: 6000 gallons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP 113-11385-00074, issued on March 3, 2000; and

(b) Notice Only Change 113-12175-00074, issued on June 9, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 3, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations. VOC emissions from the resin storage tank were calculated to be 60.8 pounds per year (0.031 tons per year) using the Tanks 3.0 program.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	836
PM_{10}	836
SO_2	0.012
VOC	285
CO	1.62
NO_X	1.93

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Styrene	255
Methyl Methacrylate	30.0
Benzene	0.00004
Dichlorobenzene	0.00002
Formaldehyde	0.001
Hexane	0.035
Toluene	0.00007
Lead Compounds	0.00001
Cadmium Compounds	0.00002
Chromium Compounds	0.00003
Manganese Compounds	0.000007
Nickel Compounds	0.00004
TOTAL	285

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} and VOC are equal to or greater than one hundred (100) tons per. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Gelcoat and Lamination Operations	5.11	5.11	-	Less than 100	-	-	Less than 100
Grinding Booth	0.011	0.011	-	-	-	-	-
Resin Storage Tank	-	-	-	0.031	-	-	-
Insignificant Activities	5.00	5.00	0.012	5.00	1.62	1.93	Negligible
Total Emissions	10.1	10.1	0.012	Less than 105	1.62	1.93	Less than 100

Pursuant to 326 IAC 2-4.1, the use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAP from use of such resins and gel coats only are limited to less than one hundred (100) tons per twelve (12) consecutive month period. For the gelcoat and lamination operations, all VOC are HAPs.

County Attainment Status

The source is located in Noble County.

Pollutant	**Status**
PM_{10}	attainment
SO_2	attainment
NO_2	attainment

Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Noble County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This Part 70 does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) The one (1) bulk resin storage tank is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart Kb), because the capacity of the tank is less than 40 cubic meters.

(d) The insignificant degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T (40 CFR 63.460-469) since no halogenated HAP solvents are used.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM_{10}. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since this source was constructed after July 27, 1997, and has a potential to emit greater than ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs, the requirements of 326 IAC 2-4.1-1 apply. Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the customized fiberglass parts manufacturing operation shall be the following:

(a) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) volatile organic HAPs from use of such resins and gel coats only shall be less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(1) Monthly usage by weight, content of monomer that is HAP, method of application, and other emission reduction techniques used for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques used for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

(2) The emission factors approved for use by IDEM, OAQ shall be taken from the

following reference: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(b) The HAP monomer content of resins and gel coats used shall be limited to the following or their equivalent on an emissions mass basis:

Type of Gel Coat or Resin	HAP Monomer Content, % by weight
Production[1] Gel Coat	37
Tooling[2] Gel Coat	38
Production Resin	35
Tooling Resin	43

[1] Production refers to the manufacture of parts.
[2] Tooling refers to the manufacture of the molds from which parts are manufactured.

HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

Gel coats or resins with HAP monomer contents lower than those specified in the table in this subsection or additional emission reduction techniques approved by IDEM, OAQ may be used to offset the use of gel coats or resins with HAP monomer contents higher than those specified in the table in this subsection. This is allowed to meet the HAP monomer content limits for resins and gel coats and shall be calculated on an equivalent emissions mass basis as shown below:

(Emissions from higher than compliant HAP monomer content resin or gel coat) -(Emissions from compliant resin or gel coat) # (Emissions from compliant resin or gel coat) -(Emissions from lower than compliant HAP monomer content resin or gel coat and/or using other emission reduction techniques).

Where: Emissions, lb or ton = M (mass of resin or gel coat used, lb or ton) *
EF (HAP monomer emission factor for resin or gel coat used, %);

EF, HAP monomer emission factor = emission factor, expressed as pounds (lbs) HAP emitted per ton of resin/gel coat processed, which is indicated by the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin used.

(c) Non-atomized spray application technology shall be used to apply unfilled production resins. Non-atomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, or other non-spray applications of a design and specifications approved by

IDEM, OAQ.

If it is not possible to apply a portion of unfilled resins with non-atomized spray application technology, equivalent emissions reductions must be obtained via use of other emission reduction techniques. Examples of other emission reduction techniques include, but are not limited to, lower HAP monomer content resins and gel coats, closed molding, vapor suppression, vacuum bagging/bonding, or installing a control device.

(d) Optimized spray techniques according to a manner approved by IDEM, OAQ shall be used for gel coats and filled resins (where fillers are required for corrosion or fire retardant purposes) at all times. Optimized spray techniques include, but are not limited to, the use of airless, air-assisted airless, high volume low pressure (HVLP), or other spray applicators demonstrated to the satisfaction of IDEM, OAQ, to be equivalent to the spray applicators listed above.

HVLP spray is the technology used to apply material to substrate by means of application equipment that operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(e) The listed work practices shall be followed:

(1) To the extent possible, a non-VOC, non-HAP solvent shall be used for cleanup.

(2) For VOC- and/or HAP-containing materials:

(i) Cleanup solvent containers shall be used to transport solvent from drums to work.

(ii) Cleanup stations shall be closed containers having soft-gasketed, spring-loaded closures and shall be kept completely closed when not in use.

(iii) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(iv) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(v) All solvent sprayed during cleanup or resin changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(3) All material storage containers shall be kept covered when not in use.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) grinding booth (GRD 08-11) shall not exceed 2.44 pounds per hour when operating at a process weight rate of 920 pounds per hour.

This limitation is based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters for PM control shall be in operation and control emissions from the one (1) grinding booth at all times that the one (1) grinding booth is in operation. The PM emissions from the grinding booth after controls are 0.002 pounds per hour which is less than the allowable PM emission rate of 2.44 pounds per hour. Therefore, the one (1) grinding booth is in compliance with this rule.

(b) Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from the gelcoat booth, the lamination booth, and the mold preparation and final finish area shall each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the gelcoat booth, the lamination booth, and the mold preparation and final finish area are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The source, constructed after January 1, 1980, is subject to the requirements of 326 IAC 8-1-6 because the potential VOC emissions from the customized fiberglass parts manufacturing operation (the gelcoat booth, the lamination booth, and the mold preparation and final finish area) are greater than twenty-five (25) tons per year, and is governed by no other provisions of Article 8. Pursuant to this rule, a Best Available Control Technology (BACT) Analysis is required. Since 326 IAC 2-4.1-1 (New Source Toxics Control) is the most stringent authority for controlling VOC/HAPs emissions, the MACT determined under 326 IAC 2-4.1-1 shall be the BACT and shall satisfy the requirements of 326 IAC 8-1-6 (BACT).

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

(a) This source is subject to the requirements of 326 IAC 20-25 because it has the potential to emit ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs, and meets all of the following criteria:

(1) The source manufactures reinforced plastics composites parts, products, or watercraft;

(2) The source includes an emission unit where resins and gel coats that contain styrene are applied and cured using the open molding process; and

(3) The source has actual emissions of styrene equal to or greater than three (3) tons per year.

Pursuant to 326 IAC 20-25-3(f), a new or reconstructed emission unit subject to 326 IAC 2-4.1-1 is not subject to the requirements of 326 IAC 20-25-3. Therefore, the customized

fiberglass parts manufacturing operation is not subject to the requirements of 326 IAC 20-25-3 (Emissions from Reinforced Plastics Composites Fabricating Emission Units; Emission Standards). However, the customized fiberglass parts manufacturing operation is subject to the requirements of 326 IAC 20-25-4 (Work practice standards), 326 IAC 20-25-6 (Record keeping requirements), 326 IAC 20-25-7 (Reporting requirements), and 326 IAC 20-25-8 (Operator training).

(b) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.

(3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(4) Solvent collection containers shall be kept closed when not in use.

(5) Clean-up rags with solvent shall be stored in closed containers.

(6) Closed containers shall be used for the storage of the following:

(A) All production and tooling resins that contain HAPs.

(B) All production and tooling gel coats that contain HAPs.

(C) Waste resins and gel coats that contain HAPs.

(D) Cleaning materials, including waste cleaning materials.

(E) Other materials that contain HAPs.

(7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

(c) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.

(2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.

(5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

(1) Name and address of the owner or operator.

(2) Address of the physical location.

(3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the grinding and machining operations, the wood shop, and the trimmers shall each not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the

solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

All emission calculations are based on the MSDS, and emission factors from "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association (CFA), April 1999. Therefore, no testing is required.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The gelcoat booth, the lamination booth, and the mold preparation and final finish area have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the gelcoat booth, the lamination booth, and the mold preparation and finish area. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the gelcoat booth, the lamination booth, and the mold preparation and finish area are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the gelcoat booth, the lamination booth, and the mold preparation and finish area stack exhausts, for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the gelcoat booth, the lamination booth, and the mold preparation and finish area must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) There are no compliance monitoring requirements applicable to the grinding booth because the allowable PM emissions are less than ten (10) pounds per hour with a control device.

Conclusion

The operation of this customized fiberglass parts manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 113-12934-00074.**

Reinforced Plastics and Composites

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 Gerber Street, Ligonier, Indiana 46563
Part 70: T 113-12934
Plt ID: 113-00074
Reviewer: Edward A. Longenberger/MES
Date: November 3, 2000

Material (Application Method)	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Transfer Efficiency
POLAR WHITE GELCOAT										
(Air Assisted Airless)										
Styrene	10.88	34.0%	315.00	0.84	20.00	28.79	690.92	126.09	122.09	75.00%
Methyl Methacrylate	10.88	5.0%	75.00	0.84	20.00	6.85	164.51	30.02	0.00	75.00%
TOOLING GELCOAT										
(Air Assisted Airless)										
Styrene	9.86	36.9%	377.00	0.0134	1.00	0.0250	0.60	0.109	0.092	75.00%
Methyl Methacrylate	9.86	5.0%	75.00	0.0134	1.00	0.00	0.12	0.02	0.00	75.00%
RESIN LAYUP										
(Flow Coat)										
Styrene	10.80	33.0%	71.00	3.83	20.00	29.37	704.84	128.63	606.93	75.00%
TOOLING RESIN										
(Flow Coat)										
Styrene	10.00	47.0%	115.00	0.134	1.000	0.077	1.85	0.34	0.78	75.00%
Clean-up solvent - Acetone	6.88	0.0%	0.00	0.16	20.00	0.00	0.00	0.00	0.00	100.00%
				Total		**65.12**	**1562.85**	**285.22**	**729.90**	
				VOC Control	0%					
				PM Control	98.0%					
				Potential Before Controls				**285.22**	**729.90**	
				Potential After Controls				**285.22**	**14.60**	
				With VOC Limited to less than 100 tons per year, Limited PM after controls =					5.11	

Note: Because All VOCs are HAPs, VOC and HAPs calculations are combined into one spreadsheet

METHODOLOGY

Potential VOC Pounds per Hour =Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton)*(1 ton/2000 lbs)
Potential VOC Pounds per Day =Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor(lb/ton)*(1 ton/2000 lbs)
Potential VOC Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor(lb/ton)*(1 ton/2000lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)
Total = Sum of all worst case coatings and solvents used
Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Appendix A: Emission Calculations
Baghouse Operations

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 Gerber Street, Ligonier, Indiana 46563
Part 70: T 113-12934
Plt ID: 113-00074
Reviewer: Edward A. Longenberger/MES
Date: November 3, 2000

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Grinding Booth	99.99%	0.000021	13500.0	24.3	106	0.002	0.011

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Boiler

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 Gerber Street, Ligonier, Indiana 46563
Part 70: T 113-12934
Plt ID: 113-00074
Reviewer: Edward A. Longenberger/MES
Date: November 3, 2000

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.4000	38.54

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.037	0.146	0.0116	1.927	0.106	1.619

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
One (1) comfort heater
HAPs Emissions

Company Name: Structural Composites of Indiana, Inc.
Address City IN Zip: 1118 Gerber Street, Ligonier, Indiana 46563
Part 70: T 113-12934
Plt ID: 113-00074
Reviewer: Edward A. Longenberger/MES
Date: November 3, 2000

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.05E-05	2.31E-05	1.45E-03	3.47E-02	6.55E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	9.64E-06	2.12E-05	2.70E-05	7.32E-06	4.05E-05	0.036

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.